

Robert J. Nelson (CSB No. 132797)  
 rnelson@lchb.com  
 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
 275 Battery Street, 29th Floor  
 San Francisco, CA 94111-3339  
 Telephone: (415) 956-1000  
 Facsimile: (415) 956-1008

Juli E. Farris (CSB No. 141716)  
 jfarris@kellerrohrback.com  
 KELLER ROHRBACK L.L.P.  
 801 Garden Street, Suite 301  
 Santa Barbara, CA 93101  
 Telephone: (805) 456-1496  
 Facsimile: (805) 456-1497

*Class Counsel*

A. Barry Cappello (CSB No. 037835)  
 abc@cappellonoel.com  
 CAPPELLO & NOËL LLP  
 831 State Street  
 Santa Barbara, CA 93101-3227  
 Telephone: (805) 564-2444  
 Facsimile: (805) 965-5950

*Lead Trial Counsel*  
*(additional counsel listed at signature)*

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

KEITH ANDREWS, an individual, et  
 al.,

Plaintiffs,

v.

PLAINS ALL AMERICAN  
 PIPELINE, L.P., a Delaware limited  
 partnership, et al.,

Defendants.

Case No. 2:15-cv-04113-PSG-JEMx

**PLAINTIFFS' SECOND  
 SUPPLEMENTAL MEMORANDUM  
 IN SUPPORT OF FINAL APPROVAL  
 OF SETTLEMENT AND PLANS OF  
 DISTRIBUTION**

Date: September 20, 2022

Time: 1:30 p.m.

Judge: Hon. Philip S. Gutierrez

Courtroom: 6A

1 Plaintiffs respectfully submit this second supplemental memorandum to  
 2 advise the Court that the lone objection to the Property Class Plan of Distribution  
 3 has been withdrawn. *See* Second Supplemental Nelson Declaration, Ex. 1 (filed  
 4 concurrently herewith). As such, not a single Class member objects to final  
 5 approval of the proposed Settlement, the Plans of Distribution, Class Counsel's  
 6 request for attorneys' fees and costs, or the request for Class Representative service  
 7 awards.

8 For the Court's convenience, Plaintiffs are filing an updated [Second  
 9 Amended Proposed] Order Granting Plaintiffs' Motion for Approval of Plans of  
 10 Distribution, which reflects that there are no objections to either of the Plans.  
 11 Plaintiffs will also re-file the proposed Final Judgment, originally attached as  
 12 Exhibit C to the Settlement (Dkt. 944-1, Ex. 1).

13 At the Final Approval Hearing set for September 20, 2022, Plaintiffs intend  
 14 to request that the Court issue the following orders:

- 15 1) Order granting final settlement approval (Dkt. 970-1);
- 16 2) Order approving the Plans of Distribution, filed concurrently herewith;
- 17 3) Order approving Attorneys' Fees, Expenses, and Service Awards (Dkt.  
 18 972-1);
- 19 4) Final Judgment, filed concurrently herewith.

20  
 21 Dated: September 16, 2022

Respectfully submitted,

22 By: /s/ Robert J. Nelson

23 Robert J. Nelson (CSB No. 132797)  
 24 Nimish Desai (CSB No. 244953)  
 25 Wilson M. Dunlavey (CSB No. 307719)  
 26 Amelia A. Haselkorn (CSB No. 339633)  
 27 LIEFF CABRASER  
 28 HEIMANN & BERNSTEIN, LLP  
 275 Battery Street, 29th Floor  
 San Francisco, CA 94111-3339  
 Telephone: (415) 956.1000  
 Facsimile: (415) 956.1008

Juli E. Farris (CSB No. 141716)  
Matthew J. Preusch (CSB No. 298144)  
KELLER ROHRBACK L.L.P.  
801 Garden Street, Suite 301  
Santa Barbara, CA 93101  
Telephone: (805) 456-1496  
Facsimile: (805) 456-1497

Lynn Lincoln Sarko (*Pro Hac Vice*)  
Gretchen Freeman Cappio (*Pro Hac Vice*)  
Michael D. Woerner (*Pro Hac Vice*)  
Daniel Mensher (*Pro Hac Vice*)  
Laura R. Gerber (*Pro Hac Vice*)  
KELLER ROHRBACK L.L.P.  
1201 Third Ave, Suite 3200  
Seattle, WA 98101  
Telephone: (206) 623-1900  
Facsimile: (206) 623-3384

*Class Counsel*

A. Barry Cappello (CSB No. 037835)  
Leila J. Noël (CSB No. 114307)  
Lawrence J. Conlan (CSB No. 221350)  
David L. Cousineau (CSB No. 298801)  
CAPPELLO & NOËL LLP  
831 State Street  
Santa Barbara, CA 93101-3227  
Telephone: (805) 564-2444  
Facsimile: (805) 965-5950

*Lead Trial Counsel*

William M. Audet (CSB No. 117456)  
Ling Y. Kuang (CSB No. 296873)  
AUDET & PARTNERS, LLP  
711 Van Ness Avenue, Suite 500  
San Francisco, CA 94102  
Telephone: (415) 568-2555  
Facsimile: (415) 568-2556

*Class Counsel*